

J Russell Farrar
William N Bates
Kristin Ellis Berexa
Teresa Reall Ricks
Molly R Cripps
Mary Byrd Ferrara*
Robyn Beale Williams
Jennifer Orr Locklin
Keith F Blue
Christopher J Larkin**

*Also licensed in KY
**Also licensed in AL

LAW OFFICES
FARRAR & BATES, L.L.P.

211 Seventh Avenue North
Suite 420
Nashville, Tennessee 37219
Telephone 615-254-3060
Facsimile 615-254-9835
E-Mail fblaw@farrar-bates.com

Of Counsel

H LaDon Baltimore

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3 TN REGULATORY AUTHORITY
DOCKET ROOM

March 31, 2005

Honorable Pat Miller, Chairman
Tennessee Regulatory Authority
ATTN: Sharla Dillon, Dockets
460 James Robertson Parkway
Nashville, TN 37243-5015

VIA HAND DELIVERY

Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection
Agreements Resulting From Changes of Law; Docket No. 04-00381

Dear Sharla:

Enclosed for filing in the above-captioned docket please find the original and 13 copies of
my letter of this date on behalf of the Joint Petitioners. Thank you for your assistance.

Sincerely,



H LaDon Baltimore
Counsel for Joint Petitioners

LDB/dcg
Enclosures
cc: Parties of Record

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Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection
Agreements Resulting From Changes of Law; Docket No. 04-00381

Dear Chairman Miller:

At the March 8, 2005 oral argument held in the above-captioned docket, Directors Kyle and Tate encouraged the parties to try to negotiate re: the "new adds" issue at the heart of Joint Petitioners' Motion for Emergency Relief. In light of this and although Joint Petitioners have long understood BellSouth's position on its "no new adds" argument to be "non-negotiable," Joint Petitioners asked BellSouth whether there is room to negotiate or whether BellSouth's position regarding "no new adds" is still non-negotiable. Joint Petitioners also indicated that, if there is room for compromise, the parties should schedule a negotiations call. BellSouth's response to this overture was that its position has not changed and that there is nothing to negotiate at this time on the "no new adds" issue. Joint Petitioners invited BellSouth to inform them in the event it had a change in position (and any willingness to compromise). Joint Petitioners have not heard from BellSouth, and thus believe that the matter is at an impasse. Negotiations cannot be successful if one side maintains that its position is non-negotiable. Thus, the matter raised by Joint Petitioners' Motion for Emergency Relief needs to be resolved by the Authority.

Sincerely,



H. LaDon Baltimore
Counsel for Joint Petitioners

LDB/dcg

Certificate of Service

The undersigned hereby certifies that on this the 31st day of March, 2005, a true and correct copy of the foregoing has been forwarded to the following via the method indicated.

Honorable Pat Miller, Chairman
March 31, 2005
Page 2

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

Guy Hicks, Esq
BellSouth Telecommunications, Inc
333 Commerce Street, Suite 2101
Nashville, TN 37201
GuyHicks@bellsouth.com
w/copy to:
Carolyn Hanesworth@bellsouth.com

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

James L. Murphy III, Esq.
Boult, Cummings, et al.
1600 Division Street, Suite 700
P. O. Box 340025
Nashville, TN 37203
jmurphy@boultcummings.com

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esq
Boult, Cummings, et al.
1600 Division Street, Suite 700
P. O. Box 340025
Nashville, TN 37203
hwalker@boultcummings.com

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

Edward Phillips, Esq.
Sprint
NCWKFR0313
14111 Capital Blvd
Wake Forest, NC 27587
Edward.phillips@mail.sprint.com

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

Charles B. Welch, Esq.
Farris, Mathews, et al.
618 Church Street, Suite 300
Nashville, TN 37219
cwelch@farrismathews.com

☐ Hand
☐ Facsimile
☐ Overnight
☒ Electronic

Dana Shaffer, Esq
Vice President, Regulatory Counsel,
XO Communications Services, Inc.
105 Malloy Street, Suite 300
Nashville, TN 37201-2315.
dshaffer@xo.com



H. LaDon Baltimore